



DEPARTMENT OF PARKS AND RECREATION

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OHMVR COMMISSION MEETING

Virtual Meeting

September 16, 2022

STAFF REPORT: Oceano Dunes SVRA Dust Update
STAFF: Ronnie Glick, Senior Environmental Scientist
SUBJECT: ODSVRA Stipulated Order of Abatement and Dust Update

Summary

The California Department of Parks and Recreation (DPR) entered a Stipulated Order of Abatement (SOA) with the San Luis Obispo County Air Pollution Control District (APCD) in April 2018 with a goal of improving regional air quality at Oceano Dunes State Vehicular Recreation Area (ODSVRA). The SOA was amended in the fall of 2019. DPR is currently working on the 2022 Annual Report and Work Plan (ARWP).

Discussion

Background: ODSVRA is in southern San Luis Obispo County. The ODSVRA is specifically located within the much larger Guadalupe-Nipomo dune system that stretches from southern San Luis Obispo County to northern Santa Barbara County. This dune system is characterized by high winds and dusty conditions.

California State Parks has been working with the APCD on regional air quality issues since 2011, entering the SOA in 2018. The SOA outlines three air quality objectives, 'to achieve state and federal ambient air quality standards...[and] establishing an initial target of reducing the maximum 24-hour PM-10 baseline emissions by fifty percent...' (Sections 2(b and c)). For the latter air quality objective, the SOA requires the use of air quality modeling to determine progress toward the initial target.

As part of the SOA, DPR produced a four-year dust plan, or Particulate Matter Reduction Plan (PMRP, www.slocleanair.org/air-quality/oceano-dunes-efforts.php). The PMRP outlines a dust control plan for ODSVRA. The California Coastal Commission permitted this plan under Coastal Development Permit 3-12-050. The SOA also established a Scientific Advisory Group (SAG), a seven-member panel of technical advisors to "evaluate, assess, and provide recommendations on the mitigation of windblown PM10 emissions" from ODSVRA.

In the fall of 2018, DPR began implementation of substantial dust control measures aimed at achieving the targets of the SOA. The projects included the 48-acre foredune, in addition to dust mitigation measures in the back dunes. These projects range from planting native dune vegetation and wind fencing, to spreading straw that reduces sand movement.

Current Status

As of July 2022, approximately 412 acres of dust control projects have been installed. In addition, in October 2021 the Department made the operational decision to close the formerly seasonal snowy plover and least tern nesting area permanently, encompassing approximately 300 additional acres. While not specifically a dust control project, the Department is working to capture the dust control benefits of this change.

Per the August 1, 2022, draft of the Annual Report and Work Plan, State Parks has over 700 acres under some form of dust control and that results in a reduction of mass emissions by 40.8%.

In February 2022, the Scientific Advisory Group finished a multi-year effort to refine the emissions targets as set out in the SOA. This work involved a complex effort to assess vegetation changes in the park over 80 years (1939 to present) and further refinements of the emissions and computer model. The SAG recommended a pre-OHV background scenario of a 40.7% reduction in mass emissions over the baseline condition from 2013. They also recommended a series of refinements to the computer model to better capture the effectiveness of certain dust control projects and to capture changes in emissions across the landscape from 2013 through 2019.

Based on this work from the SAG, the Department submitted a letter to the APCD on February 22, 2022, requesting a modification to the SOA to amend the initial mass reduction target of 50% to 40.7% and to clarify the requirements to meet the state PM10 concentration standards. The APCD Hearing Board has not taken action on this request.

DPR prepared an initial 2022 Annual Report and Work Plan on August 1, 2022. We received comments from the APCD and SAG on August 23, 2022. A revised 2022 Annual Report and Work Plan will be available in mid-September of 2022.

Per the Stipulated Order of Abatement, as amended, no further revisions will be considered after October 1, 2022.

Commission Action

For information only

Attachments

1 February 22, 2022, Letter to Air Pollution Control District